

Karma M. Giulianelli (SBN 184175)  
karma.giulianelli@bartlitbeck.com

**BARTLIT BECK LLP**

1801 Wewetta St., Suite 1200  
Denver, Colorado 80202  
Telephone: (303) 592-3100

Hae Sung Nam (*pro hac vice*)  
hnam@kaplanfox.com

**KAPLAN FOX & KILSHEIMER LLP**

850 Third Avenue  
New York, NY 10022  
Tel.: (212) 687-1980

*Co-Lead Counsel for the Proposed Class in In re Google Play Consumer Antitrust Litigation*

Paul J. Riehle (SBN 115199)  
paul.riehle@faegredrinker.com

**FAEGRE DRINKER BIDDLE & REATH LLP**

Four Embarcadero Center, 27th Floor  
San Francisco, CA 94111  
Telephone: (415) 591-7500

Christine A. Varney (*pro hac vice*)  
cvarney@cravath.com

**CRAVATH, SWAINE & MOORE LLP**

825 Eighth Avenue  
New York, New York 10019  
Telephone: (212) 474-1000

*Counsel for Plaintiff Epic Games, Inc. in Epic Games, Inc. v. Google LLC et al.*

Brendan P. Glackin (SBN 199643)  
bglackin@agutah.gov

**OFFICE OF THE UTAH ATTORNEY GENERAL**

160 E 300 S, 5th Floor  
PO Box 140872  
Salt Lake City, UT 84114-0872  
Telephone: (801) 366-0260  
*Counsel for the Plaintiff States*

Douglas J. Dixon (SBN 275389)  
ddixon@hueston.com

**HUESTON HENNIGAN LLP**

620 Newport Center Drive, Suite 1300  
Newport Beach, CA 92660  
Telephone: (949) 229-8640  
*Counsel for Plaintiffs Match Group, LLC, et al.*

Glenn D. Pomerantz (SBN 112503)  
glenn.pomerantz@mto.com

**MUNGER, TOLLES & OLSON LLP**

350 South Grand Avenue, Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)  
brian.rocca@morganlewis.com

**MORGAN, LEWIS & BOCKIUS LLP**

One Market, Spear Street Tower  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000

*Counsel for Defendants Google LLC et al*

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE  
ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

**STIPULATED [PROPOSED] ORDER  
MODIFYING SEALING PROCEDURES  
RELATING TO DISPOSITIVE AND  
DAUBERT MOTIONS**

*Epic Games, Inc. v. Google LLC et al.*,  
Case No. 3:20-cv-05671-JD

Judge: Hon. James Donato

*In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.*,  
Case No. 3:22-cv-02746-JD

WHEREAS, Plaintiff Epic Games, Inc. (“Epic”), Plaintiffs Match Group LLC, et al. (“Match”), Consumer Plaintiffs, State Attorneys General Plaintiffs, and Defendants Google LLC et al. (“Google,” and collectively, the “Parties”), by and through their undersigned counsel, respectfully move this Court for a modification to the sealing procedures applicable to any dispositive and *Daubert* motions filed in these matters and subsequent briefing on any such motions, on the grounds set forth herein.

WHEREAS, under the Third Amended Scheduling Order entered by the Court, dispositive and *Daubert* motions are due on April 20, 2023; responses are due May 18, 2023; and replies are due on June 8, 2023 (ECF No. 447).

WHEREAS, the Parties informed the Court in their January 31, 2023 Joint Proposed Schedule: “With respect to dispositive and *Daubert* motions, the Parties will submit a stipulation for approval that states that they will file redacted versions of these briefs and supporting documents on April 20, May 18, and June 8, without accompanying motions to seal.” (ECF No. 434 at 2 n.2.)

WHEREAS, the Parties have conferred and agree on a protocol and dates for submitting an Omnibus Sealing Motion following the completion of briefing of dispositive and *Daubert* motions.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED SUBJECT TO THE COURT’S APPROVAL:

- The Parties shall file redacted versions of any dispositive and *Daubert* motions, as well as any responses and replies to such motions, and any associated supporting documents, as separate entries on the ECF docket; and

- The Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a 1-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming omnibus sealing motion; and
- Within twenty-one days of filing any dispositive or *Daubert* motion, as well as any response to such motions, and within fourteen days of filing any reply to a dispositive or *Daubert* motion, that include information filed provisionally under seal, the Parties shall provide each other their purported basis for keeping the redacted information under seal; and
- The Parties and any non-parties shall jointly file Omnibus Sealing Motions on July 13, 2023 (i.e., five weeks after the completion of dispositive and *Daubert* motion briefing), or any date that this Court chooses following the completion of dispositive and *Daubert* motion briefing.

1 Dated: April 17, 2023

CRAVATH, SWAINE & MOORE LLP

Christine Varney (pro hac vice)

2 Gary A. Bornstein (pro hac vice)

Timothy G. Cameron (pro hac vice)

3 Yonatan Even (pro hac vice)

Lauren A. Moskowitz (pro hac vice)

4 Justin C. Clarke (pro hac vice)

Michael J. Zaken (pro hac vice)

5 M. Brent Byars (pro hac vice)

6 FAEGRE DRINKER BIDDLE & REATH LLP

7 Paul J. Riehle (SBN 115199)

8 Respectfully submitted,

9 By: /s/ Lauren A. Moskowitz

Lauren A. Moskowitz

10 *Counsel for Plaintiff Epic Games, Inc.*

11  
12  
13 Dated: April 17, 2023

BARTLIT BECK LLP

14 Karma M. Giulianelli

15 KAPLAN FOX & KILSHEIMER LLP

16 Hae Sung Nam

17 Respectfully submitted,

18 By: /s/ Karma M. Giulianelli

Karma M. Giulianelli

19 *Co-Lead Counsel for the Class in In re*  
20 *Google Play Consumer Antitrust Litigation*

1 Dated: April 17, 2023

PRITZKER LEVINE LLP  
Elizabeth C. Pritzker

3 Respectfully submitted,

4 By: /s/ Elizabeth C. Pritzker  
Elizabeth C. Pritzker

*Liaison Counsel for the Class in In re Google  
Play Consumer Antitrust Litigation*

8 Dated: April 17, 2023

OFFICE OF THE UTAH ATTORNEY  
GENERAL

9 Brendan P. Glackin  
Lauren Weinstein

11 Respectfully submitted,

12 By: /s/ Brendan P. Glackin  
Brendan P. Glackin

*Counsel for Plaintiff States*

15 Dated: April 17, 2023

HUESTON HENNIGAN LLP  
Douglas J. Dixon  
Christine Woodin  
Joseph A. Reiter

18 Respectfully submitted,

19 By: /s/ Douglas J. Dixon  
Douglas J. Dixon

*Counsel for Plaintiffs Match Group, LLC  
et al.*

1 Dated: April 17, 2023

MORGAN, LEWIS & BOCKIUS LLP  
Brian C. Rocca  
Sujal J. Shah  
Minna L. Naranjo  
Rishi P. Satia  
Michelle Park Chiu

2  
3  
4 Respectfully submitted,

5 By: /s/ Brian C. Rocca  
6 Brian C. Rocca

7 *Counsel for Defendants Google LLC et al.*  
8

9 Dated: April 17, 2023

MUNGER, TOLLES & OLSON LLP  
Glenn D. Pomerantz  
Kyle W. Mach  
Kuruvilla Olasa  
Justin P. Raphael  
Emily C. Curran-Huberty  
Jonathan I. Kravis

10  
11  
12 Respectfully submitted,

13 By: /s/ Glenn D. Pomerantz  
14 Glenn D. Pomerantz

15  
16 *Counsel for Defendants Google LLC et al.*  
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18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19 Dated: \_\_\_\_\_

20 HON. JAMES DONATO  
21 United States District Judge  
22

**E-FILING ATTESTATION**

I, Minna L. Naranjo, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Minna L. Naranjo  
Minna L. Naranjo